IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO.

v. : DATE FILED:

BLAIR STROUSE : VIOLATIONS:

: 18 U.S.C. § 2261A (cyberstalking –

1 count)

: 18 U.S.C. § 875(c) (interstate

communication of threats - 5

: counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

BACKGROUND

- At all times relevant to this indictment, defendant BLAIR STROUSE was a
 United States citizen living in Warminster, in the Eastern District of Pennsylvania.
- 2. Beginning sometime in or around February 2015, defendant BLAIR STROUSE began communicating online with an individual known to the Grand Jury, M.G., a Brazilian citizen, living in Brazil. Defendant STROUSE and M.G. met in an online chat room for individuals, such as M.G., who were learning English, to improve their language skills by communicating with English-speaking individuals. As defendant STROUSE and M.G. continued to communicate online, they developed a romantic relationship.

- 3. In or around June 2016, M.G. traveled to the United States to work for a company that provided au pair services to families in the United States. M.G. was assigned to a family living in San Francisco, California.
- 4. In or around August 2016, M.G. left her au pair position in San Francisco for Warminster, Pennsylvania where she began living with defendant BLAIR STROUSE.
- 5. On or about September 11, 2016, defendant BLAIR STROUSE married M.G. A short time later, defendant BLAIR STROUSE began repeatedly mistreating M.G. As a result of that mistreatment, on or about November 24, 2016, M.G. moved out of the Warminster residence that she had shared with defendant STROUSE.
- 6. At all times relevant to this indictment, M.G. had a sister known to the Grand Jury, A.G., and a mother known to the Grand Jury, L.G., both of whom lived in Brazil.
- 7. Beginning in or around December 2016, and ending as late as May 10, 2018, defendant BLAIR STROUSE engaged in a course of conduct that was designed to place M.G. in reasonable fear of death and serious bodily injury to M.G., A.G., and L.G., and that was designed to cause substantial emotional distress to M.G.
- 8. Defendant BLAIR STROUSE engaged in this course of conduct by sending electronic communications from the Eastern District of Pennsylvania to numerous individuals, most of whom were living in Brazil, threatening to kill and attack, and solicit others to kill and attack, M.G., A.G., L.G. and others.
- 9. In these electronic communications, defendant BLAIR STROUSE frequently used alias email addresses and online identifications designed to appear as the addresses and identifications of other individuals known to M.G., A.G., and L.G. Defendant STROUSE also

frequently invoked the name of A.G. as the object of his threats while implicitly threatening his wife, M.G., who understood defendant STROUSE also to be threatening M.G.

10. Defendant BLAIR STROUSE engaged in this course of conduct, at least in substantial part, after a judge in the Bucks County Court of Common Pleas, on or about February 13, 2017, issued a Protection From Abuse Order ("PFA") against defendant STROUSE for the protection of M.G., A.G., L.G., and others. The Court issued the PFA, and subsequently issued several renewals of the PFA, at the request of M.G. based on the internet communications described below, which defendant STROUSE well knew were causing substantial emotional distress to M.G., A.G., and L.G. M.G. requested, and then obtained, the issuance of the PFA and the subsequent renewals because she feared for the safety of M.G., A.G., and L.G.

THE COURSE OF CONDUCT

- 11. The course of conduct referred to in Paragraph 10 included, but was not limited to the communications sent by defendant BLAIR STROUSE as described below.
- 12. In or around January 2017, in an internet communication made through a social networking website, OkCupid, using an alias account in the name of "PresidenGenocide," defendant BLAIR STROUSE stated to M.G., "I want to rip you apart and sell your organs and wear your skin."
- 13. In or around January 2017, in electronic communications written in Portuguese, using an alias account in the name of "Cesar Villez," defendant BLAIR STROUSE stated that his purpose in life was to make members of M.G.'s family "suffer," and defendant STROUSE displayed photographs of a purported itinerary from the travel website Kayak.com for STROUSE to fly from the United States to Brazil. To further harass, intimidate, and place his

victims in fear for their safety, defendant STROUSE redacted from the photograph of the itinerary the dates of his purported travel to Brazil.

- 14. On or about July 23, 2017, defendant BLAIR STROUSE used the alias email address rnader5002@yahoo.com to send an email to A.G. stating in Portuguese that because A.G. supposedly refuses to end their relationship, he thinks about attacking her in violent ways, such as, drowning her in a bathtub, having her attacked by dogs, strangling her, and burying her alive.
- 15. On or about July 27, 2017, defendant BLAIR STROUSE used the alias email address jtorres54011@gmail.com to send an email to numerous individuals in Brazil associated with A.G., stating in Portuguese:

Hi, I'm now offering U.S. \$5,000 to anyone who sticks it to [A.G.]. It should be a serious injury. Brain damage, disfigurement, facial scars, permanent disabilities are acceptable. Payment will be made in U.S. \$2,500 immediately after, and monthly payments of U.S. \$500 afterwards. See attached for current photo. I'm going to concentrate the offer on other students in the coming days.

Defendant STROUSE attached to the email a photograph of A.G.

16. On or about July 30, 2017, defendant BLAIR STROUSE used the alias email address bsaget5089@mail.com to send an email to numerous individuals associated with A.G. in Brazil, stating in Portuguese:

This is a friendly reminder that anyone who gives brain damage, permanent disabilities, facial scars, or a mutation to [A.G.] from Juazeiro or her mother [L.G.] from Sento Se. They'll be paid \$5,000. Current exchange rates are applicable. Images of each one are attached.

Attached to the email were photographs of A.G. and L.G.

17. On or about August 11, 2017, defendant BLAIR STROUSE used the alias email address jtorres5409@mail.com to send an email to numerous individuals associated with A.G. in Brazil, stating in Portuguese:

This weekend, I'm going to concentrate on finding someone to kill [L.G.]. It will be easier to find someone to kill her. It's easier to escape after killing her. She's going to die. This will be [A.G.'s] fault. [A.G.] will be destroyed. Her tears make me so happy. If she opts to speak with me . . . to stop that. Until then, [L.G.'s] death. 5000 to attack [L.G.].

18. On or about August 11, 2017, defendant BLAIR STROUSE used the alias email address bsaget5089@mail.com to send an email to numerous individuals associated with A.G. in Brazil, stating in Portuguese:

May peace be with you: I'm getting in touch with you with a business opportunity. I need for a woman to be attacked. Her name is [L.G.] [L.G.'s] photo is attached. I'm paying \$5,000. The payment is in U.S. dollars. Send an email for more information or questions. Everyone is blind-copied. No one knows who received the email or who is answering. Your cousin, your friend, or aunt can do this. She's old and easy to attack. \$5,000 U.S. money is a lot. The offer remains open. I'm very serious about this. I would give everything that I have so [L.G.] can get injured. Everyone in Sento Se is familiar with this offer. No one is going to suspect you. She has thousands of people that wanted to hurt her. Do it soon. I will be very happy.

Attached to the email was a photograph of L.G.

19. On or about August 15, 2017, defendant BLAIR STROUSE used the alias email address alinearajuo@gmail.com to send an email to A.G. in Brazil, stating in English:

I have spent 4 hours trying to finalize the deal to have your mother attacked. Please help stop this. I am taking a break tonight because I am tired. But you KNOW I will not stop. Please talk to me. Before someone gets hurt.

20. On or about August 16, 2017, defendant BLAIR STROUSE used the alias email address makavelitobe@yahoo.com to send an email to A.G. in Brazil, stating in English:

I just do not want you to live in Bucks county . . . I will never let you live here. You will not survive . . . I will kill you [A.G.]. I will fucking find you, I will fund your children and I will kill them before I kill you I will fucking kill you [A.G.]. I will find someone to attack your mother and give her brain damage. You will feed her, because she will not be able to feed herself. Lets continue our relationship because you do not want a divorce. You do not want to talk. Lets us keep doing this because I love it. Lets be honest. It makes me happy to try to kill you. Last week I thought I could [A.G.]. I was ready. But you did not take the train. But I will I will have my people in Juazeiro find you.

21. On or about August 16, 2017, defendant BLAIR STROUSE used the email address bstrou@gmail.com (display name "Blair Strouse") to send an email to A.G., stating in English:

I will not stop acting the way I do. You have motivated me so much more. I will be more focused to find someone to attack [an individual known to the Grand Jury, Mi.G., another sister of M.G.] and your mother. I will focus more on this. You have given me the motivation. Only you can stop it. By talking. Sorry. I wish we could of talked about this.

22. On or about August 17, 2017, defendant BLAIR STROUSE used the email address bstrou@gmail.com (display name "Blair Strouse"), sent an email to A.G., stating in English:

I will kill you someday [A.G.]. That day gets close and closer. You can not hide forever. Likely it will be when you are older and have children. I will kill them. You can not hide forever. You will make a mistake. And I will find you. Promise.

23. On or about September 12, 2017, defendant BLAIR STROUSE used the alias email address passosmaria362@gmail.com to send an email to A.G. and numerous other individuals, stating in Portuguese:

[A.G.] likes to be abused during sex. She likes to be hit. She likes to be humiliated. She is very obedient and will do anything she wants. She is not afraid of getting dirty. Imagine.

- 24. On or about September 13, 2017, defendant BLAIR STROUSE used the alias email address jtorres5408@mail.com to send an email to A.G., stating in English: "I will find you. I am going to murder you. This will not stop until I do. See you soon."
- 25. On or about September 27, 2017, defendant BLAIR STROUSE used the alias email address mgama5709@gmail.com to send an email to A.G. and numerous individuals associated with A.G. in Brazil, stating in English:

Anyone who attacks [A.G.] will be given 5000. If your attack kills her you will be paid 10000, american dollars. This is not a joke. Thousands of people are receiving this message. I send it to the police asking for them to kill [A.G.]. No one will ever know you did it. Thousands and thousands of suspects. I send the messages to [A.G.] herself. She is going to die. She can do nothing. We will all celebrate when she is dead. Rest in piece [A.G.] This is your destiny.

THE CHARGE

26. From in or around December 2016 through at least May 10, 2018, in the Eastern District of Pennsylvania and elsewhere, defendant

BLAIR STROUSE

with the intent to harass and intimidate M.G., used interactive computer services, electronic communications services, electronic communications systems of interstate commerce, and facilities of interstate and foreign commerce, to engage the course of conduct listed above that placed M.G. in reasonable fear of the death and serious bodily injury to M.G., A.G., and L.G., and caused and attempted to cause, and which defendant STROUSE reasonably expected to cause, substantial emotional distress to M.G., A.G., and L.G.

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

- 1. Paragraphs 1 through 16 and 18 through 25 of Count One are incorporated here.
- 2. On or about August 11, 2017, defendant BLAIR STROUSE used the alias email address jtorres5409@mail.com to send an email to numerous individuals associated with A.G. in Brazil, stating in Portuguese:

This weekend, I'm going to concentrate on finding someone to kill [L.G.]. It will be easier to find someone to kill her. It's easier to escape after killing her. She's going to die. This will be [A.G.'s] fault. [A.G.] will be destroyed. Her tears make me so happy. If she opts to speak with me . . . to stop that. Until then, [L.G.'s] death. 5000 to attack [L.G.]

 On or about August 11, 2017, in Warminster, in the Eastern District of Pennsylvania, and elsewhere, defendant

BLAIR STROUSE

knowingly and intentionally transmitted in interstate and foreign commerce a communication containing a threat to injure another person, that is, defendant STROUSE sent an email to numerous individuals in Brazil, threatening to kill L.G. and destroy A.G.

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

- 1. Paragraphs 1 through 19 and 21 through 25 of Count One are incorporated here.
- 2. On or about August 16, 2017, defendant BLAIR STROUSE used the alias email address makavelitobe@yahoo.com to send an email to A.G. in Brazil, stating in English:

I just do not want you to live in Bucks county . . . I will never let you live here. You will not survive . . . I will kill you [A.G.]. I will fucking find you, I will fund your children and I will kill them before I kill you I will fucking kill you [A.G.]. I will find someone to attack your mother and give her brain damage. You will feed her, because she will not be able to feed herself. Lets continue our relationship because you do not want a divorce. You do not want to talk. Lets us keep doing this because I love it. Lets be honest. It makes me happy to try to kill you. Last week I thought I could [A.G.]. I was ready. But you did not take the train. But I will I will have my people in Juazeiro find you.

 On or about August 16, 2017, in Warminster, in the Eastern District of Pennsylvania, and elsewhere, defendant

BLAIR STROUSE

knowingly and intentionally transmitted in interstate and foreign commerce a communication containing a threat to injure other persons, that is, defendant STROUSE sent an email to numerous individuals in Brazil, threatening to kill A.G. and her children and threatening to injure L.G.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

- 1. Paragraphs 1 through 21 and 23 through 25 of Count One are incorporated here.
- 2. On or about August 17, 2017, defendant BLAIR STROUSE used the email address bstrou@gmail.com (display name "Blair Strouse") to send an email to A.G., stating in English:

I will kill you someday [A.G.]. That day gets close and closer. You can not hide forever. Likely it will be when you are older and have children. I will kill them. You can not hide forever. You will make a mistake. And I will find you. Promise.

 On or about August 17, 2017, in Warminster, in the Eastern District of Pennsylvania, and elsewhere, defendant

BLAIR STROUSE

knowingly and intentionally transmitted in interstate and foreign commerce a communication containing a threat to injure another person, that is, defendant STROUSE sent an email to A.G. in Brazil, threatening to kill A.G. and her children.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES:

- 1. Paragraphs 1 through 23 and 25 of Count One are incorporated here.
- 2. On or about September 13, 2017, defendant BLAIR STROUSE used the alias email address jtorres5408@mail.com to send an email to A.G., stating in English: "I will find you. I am going to murder you. This will not stop until I do. See you soon."
- On or about September 13, 2017, in Warminster, in the Eastern District of Pennsylvania, and elsewhere, defendant

BLAIR STROUSE

knowingly and intentionally transmitted in interstate and foreign commerce a communication containing a threat to injure another person, that is, defendant STROUSE sent an email to A.G. in Brazil, threatening to kill A.G.

COUNT SIX

THE GRAND JURY FURTHER CHARGES:

- 1. Paragraphs 1 through 24 of Count One are incorporated here.
- 2. On or about September 27, 2017, defendant BLAIR STROUSE used the alias email address mgama5709@gmail.com to send an email to A.G. and numerous individuals associated with A.G. in Brazil, stating in English:

Anyone who attacks [A.G.] will be given 5000. If your attack kills her you will be paid 10000, american dollars. This is not a joke. Thousands of people are receiving this message. I send it to the police asking for them to kill [A.G.]. No one will ever know you did it. Thousands and thousands of suspects. I send the messages to [A.G.] herself. She is going to die. She can do nothing. We will all celebrate when she is dead. Rest in piece [A.G.] This is your destiny.

 On or about September 27, 2017, in Warminster, in the Eastern District of Pennsylvania, and elsewhere, defendant

BLAIR STROUSE

knowingly and intentionally transmitted in interstate and foreign commerce a communication containing a threat to injure another person, that is, defendant STROUSE sent an email to A.G. and numerous individuals associated with A.G. in Brazil, threatening to attack and kill A.G.

In violation of Title 18, United States Code, Section 875(c).

A TRUE BILL:

GRAND JURY FOREPERSON

Double of for WILLIAM M. McSWAIN UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

BLAIR STROUSE

INDICTMENT

Counts

18 U.S.C. §875(c) -Interstate and foreign communication of threats - 5 counts 18 U.S.C. § 2261A- Cyberstalking - 1 count

| | | day, | | |
|--------------|---------|--------------------------|-------|----------|
| A true bill. | Foreman | Filed in open court this | Clerk | Bail, \$ |